

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

In re TWITTER, INC. SECURITIES  
 LITIGATION

Case No. 4:16-cv-05314-JST (SK)  
 (Consolidated with 4:16-cv-05439-JST)

This Document Relates to:  
 ALL ACTIONS

**CLASS ACTION**

**DECLARATION OF KRISTA BESSINGER  
 CERTIFYING RECORDS PURSUANT TO  
 FEDERAL RULES OF EVIDENCE 803(6) AND  
 902(11)**

1 I, Krista Bessinger, hereby declare:

2 1. I served as the Senior Director of Investor Relations in Twitter, Inc. from 2013 to 2018.  
3 In that role, I oversaw Twitter's communications and interactions with analysts and investors. I  
4 currently serve as Vice President, Investor Relations at Twitter, in which I perform substantially  
5 identical duties. I have personal knowledge of all facts stated in this declaration and would testify  
6 competently thereto if called upon as a witness.

7 2. As described in detail herein, the trial exhibits referred to in this Declaration constitute  
8 writings maintained, taken, or made in the regular or ordinary course of business of Twitter at or near  
9 the time of the act, condition, event, or opinion to which they relate by—or from information  
10 transmitted by—persons employed by Twitter who had (1) knowledge of the act, condition, event, or  
11 opinion; and (2) a business duty to Twitter to accurately and completely take, make, and maintain such  
12 records and documents in the regular practice of the regularly-conducted activities required by their  
13 positions.

14 3. Trial Exhibit 2002<sup>1</sup> is a document titled "Analyst Day Hot Topics." The timeline was  
15 prepared as a regular practice in connection with my and Twitter's regularly-conducted activity of  
16 preparing for investor events—in this case, Twitter's November 2014 Analyst Day—by compiling  
17 information to be discussed on those calls and holding meetings with key stakeholders within the  
18 Company. My team and I prepared this list of topics based on our personal knowledge of Twitter's  
19 preparation needs, at or near the time we determined those topics.

20 4. Trial Exhibit 2651 is a document outlining anticipated questions and responses in  
21 advance of Twitter's Q1 2015 earnings call. Twitter employees drafted this set of questions and  
22 answers as a regular practice of preparing for Twitter's earnings calls, which the Company regularly  
23 conducted on a quarterly basis. The Twitter employees who prepared this list of did so based on their  
24 personal knowledge of Twitter's preparation needs and potential questions from investors, at or near  
25 the time they determined those topics.

26 5. Trial Exhibit 2743 is an email from me to Linus Lee, a data scientist at Twitter. My

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28 <sup>1</sup> All references to Trial Exhibits correspond to the exhibit numbers in Defendants' operative trial  
exhibit list, ECF No. 594-4, filed on June 30, 2021.

1 email contains a question regarding Twitter's user growth, which was sent in connection with my and  
2 Twitter's routine practice of preparing for quarterly earnings calls by researching information to be  
3 discussed on those calls. The email attaches a document known as a "bridge," which Twitter prepared  
4 on monthly and quarterly basis to summarize trends in various non-financial metrics as part of its  
5 regular practice of tracking those metrics. Mr. Lee prepared the bridge based on his personal  
6 knowledge of the data underlying it at that time, and he circulated it to the individuals copied on this  
7 emails as part of his and Twitter's regular practice of distributing bridges to relevant personnel on a  
8 monthly basis and in conjunction with quarterly earnings preparations.

9         6. Trial Exhibit 2745 is an email dated January 29, 2015 that Twitter employee Linus Lee  
10 sent to me, Ankit Gupta, Kenney Deng, Anthony Noto, Celia Poon, Yvonne Leung, and Amir  
11 Movafaghi regarding Twitter's user growth at that time. Mr. Lee sent this email as a regular practice  
12 of his and Twitter's regularly-conducted activity of reporting on and discussing information regarding  
13 Twitter's user growth and strategy. Specifically, Mr. Lee's email was in response to an inquiry I sent  
14 as my regular practice of confirming important information about Twitter in advance of the  
15 Company's regularly-conducted earnings calls. The contents of Mr. Lee's email and other emails  
16 contained in this exchange are based on their authors' personal knowledge and were prepared at or  
17 near the time of the events described therein.

18         7. Trial Exhibit 3240 is a document containing minutes from regular meetings of Twitter's  
19 Metrics Task Force. I attended meetings of the Metrics Task Force, which met on a roughly biweekly  
20 basis. These minutes were prepared as a regular practice of maintaining notes and minutes at the  
21 Metrics Task Force's regularly-conducted meetings, and they were prepared at or near the time of the  
22 meetings described therein by a Twitter employee who attended those meetings and had personal  
23 knowledge of their contents.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on September 10,  
2 2021 in Oakland, California.

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